

Robert Alan Jones, Esq.
Pro hac vice
RAJ LIMITED, PC
1061 East Flamingo Road, Suite #7
Las Vegas, Nevada 89119
(702) 791-0742 Telephone
(702) 736-0773 Facsimile
Rajltd@aol.com

CHRIS DIETRICH, Bar No. 092592
11300 West Olympic Boulevard
Suite 800
Los Angeles, California 90064
(310) 312-6888

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE**

VICKI R. SEIDEL

Plaintiff,
v.

UNITED STATES OF AMERICA,
Defendant.

CASE NO: 5:07-CV-03141 - JF
Honorable Judge Jeremy Fogel
SUPPLEMENT TO MOTION FOR
PARTIAL RECONSIDERATION
OF ORDER DENYING MOTION FOR
TEMPORARY RESTRAINING ORDER

**SUPPLEMENT TO MOTION FOR PARTIAL RECONSIDERATION OF ORDER
DENYING MOTION FOR TEMPORARY RESTRAINING ORDER**

The instant supplement to Motion for Partial Reconsideration of Order Denying Motion for Temporary Restraining Order (Document 12) is being filed due to the continuing harassment that Vicki Seidel has been subjected to by Revenue Office Joe Smith. On June 25, 2007, Mr. Smith left a telephone message threatening Vicki Seidel's employer, a potential witness in both the instant action and her pending criminal case.(CR: 06-00539-JF-RS).(see attached declaration of Vicki Seidel).

//

1 DATED: This 25th day of June, 2007.

2 Respectfully submitted,

3 /s/ Robert Alan Jones

4 Robert Alan Jones, Esq.

5 *Pro hac vice*

6 RAJ LIMITED, PC

7 1061 East Flamingo Road, Suite #7

8 Las Vegas, Nevada 89119

9 (702) 791-0742 Telephone

10 (702) 736-0773 Facsimile

11 Rajltd@aol.com

12 /s/ Chris Dietrich

13 CHRIS DIETRICH, Bar No. 092592

14 11300 West Olympic Boulevard

15 Suite 800

16 Los Angeles, California 90064

17 (310) 312-6888

CERTIFICATE OF SERVICE

This is to certify that on June 25, 2007, I caused to be served the foregoing **SUPPLEMENT TO MOTION FOR PARTIAL RECONSIDERATION OF ORDER DENYING MOTION FOR TEMPORARY RESTRAINING ORDER**, using the electronic court filing system, and will be distributed to all parties shortly after its filing.

United States Attorney
Scott N. Schools
United States Attorney's Office
450 Golden Gate Avenue, Box 36055
San Francisco, CA 94102
(415-436-7200)

Attorney General Alberto Gonzales
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
(202-353-1555)

Commissioner of Internal Revenue
Mark W. Everson
1111 Constitution Avenue NW
Washington, DC 20224-0002

Additionally:
by fax:

AUSA David L. Denier
9TH FLOOR
FEDERAL BUILDING
450 Golden Gate Ave.
Box 36055
San Francisco, CA 94102
(408) 535-5163
Fax: (415) 436-6748
david.denier@usdoj.gov


Dated this 25TH day of June, 2007.

/s/ Stephanie Burton
Office of Robert Alan Jones

SUPPLEMENTAL DECLARATION OF VICKI SEIDEL
IN SUPPORT OF MOTION FOR PARTIAL RECONSIDERATION

1. Declarant is a resident and citizen of the state of California.
 2. I am over the age of 21 and if called to testify, am competent and willing to do so and would testify as follows:
 3. On June 12, 2007, United States wrongfully attempted to levy 100% of my salary due to me from employment in the amount of about \$4,400.00, ignoring statutory exemptions.
 4. On the morning of June 25, 2007, Revenue Officer Joe Smith of the Santa Cruz, California IRS office called my place of employment and left a voice mail for my employer stating that Mr. Smith had levied 100% my wages for the month of June and had just sent out another levy for 100% of my wages for July. Smith stated that he was not sure that my employer had received or was aware of the June levy because I had signed for the letter containing the levy. Mr. Smith further stated that I was to receive no wages and if my employer did not comply he would be liable for an amount equal to 100% of my wages plus a penalty.
 5. Because the levies are against me for 100% of my salary without exemption and I have minor children who are dependent for their sustenance, and because of the aforementioned telephone message and the sending of levies to my place of business have created havoc with my reputation and my credibility in the insurance community, I am suffering continuing irreparable harm.
 6. If 100% of my wages are taken I will not be able to afford childcare and will be forced to quit my job.
- I declare under penalty of perjury under the laws of the United States of America, the foregoing is true and correct to the best of my personal knowledge and belief.

Dated 25th day of June, 2007.


Vicki R. Seidel